

103553

This Deed, made this 26th day of May 1971  
 Between, PERRY PHILLIPS and JEANNE E. PHILLIPS, his wife

of the one part, and JOSEPH M. BLOSENSKI, JR.  
 (hereinafter called the "Grantee"), of the other part

Witnesseth. That in consideration of Thirty Thousand (\$30,000)

In hand paid, the receipt whereof is hereby acknowledged, the said Grantor S do hereby grant and convey unto the Grantee S, their heirs, executors and assigns.

TRACT NO. 1 - ALL THAT CERTAIN lot or piece of ground with the buildings and improvements thereon erected situate in the Township of West Cain, County of Chester, State of Pennsylvania and described according to a plan of property of Herbert Ash, Jr., said plan made by G. D. Houtman and Son, Civil Engineers and Land Surveyors, dated March 29, 1962, as follows to wit:

BEGINNING at a point on the center line of King's Highway (Route 340) (50 feet wide) at the distance of 16.29 feet measured on a bearing of South 04 degrees 01 minute East from a point in the bed of King's Highway, a corner of land now or late of Charles W. Ash; thence extending from said point of beginning along the center line of King's Highway, North 89 degrees 11 minutes West 352.50 feet to a point, a corner of Lot No. 1 thence extending along Lot No. 1 North no degrees 49 minutes East crossing the Northeastly side of King's Highway 420.59 feet to a point in line of land now or late of Perry Phillips; thence extending along the last mentioned land North 86 degrees 55 minutes East partly through a building owned by Perry Phillips 315.86 feet to a point in line of land now or late of Charles W. Ash aforesaid; thence extending partly along the last mentioned land and partly along Lot No. 8 South 04 degrees 01 minute East recrossing the Northeastly side of King's Highway 443.64 feet to the first mentioned point and place of beginning.

BEING LOT NUMBER 3 as shown on the above mentioned Plan.

CONTAINING 3.31 acres more or less.

BEING the same premises which Laura C. Ash, et al. by their Deed dated June 15, 1962, conveyed in Deed Book K-34, Page 125, granted and conveyed to them, et ux., grantors herein.

TRACT NO. 2 - ALL THAT CERTAIN tract or lot of woodland, situate in the Township of West Cain, County, State of Pennsylvania, bounded and contained as follows to wit:

Beginning at a point on the center line of King's Highway (Route 340) (50 feet wide) at the distance of 16.29 feet measured on a bearing of South 04 degrees 01 minute East from a point in the bed of King's Highway, a corner of land now or late of Charles W. Ash; thence extending from said point of beginning along the center line of King's Highway, North 89 degrees 11 minutes West 352.50 feet to a point, a corner of Lot No. 1 thence extending along Lot No. 1 North no degrees 49 minutes East crossing the Northeastly side of King's Highway 420.59 feet to a point in line of land now or late of Perry Phillips; thence extending along the last mentioned land North 86 degrees 55 minutes East partly through a building owned by Perry Phillips 315.86 feet to a point in line of land now or late of Charles W. Ash aforesaid; thence extending partly along the last mentioned land and partly along Lot No. 8 South 04 degrees 01 minute East recrossing the Northeastly side of King's Highway 443.64 feet to the first mentioned point and place of beginning.

CONTAINING five (5) acres and twenty-seven (27) perches of land be the same, more or less.

BEING the same premises which Mary B. Burt, et al. by their Deed dated February 19, 1953, and recorded in Deed Book Q-24, Page 209, granted and conveyed unto Perry Phillips.

*Done  
enforcement*



REAL ESTATE TRANSFER TAX

PAID \$ 500.00

*Jose B. Giff*

Dep. Sec.

X39

799

200002

DEPOSITION  
EXHIBIT  
1  
KMS 10 27

ORIGINAL  
(Red)

And the said Grantee do hereby covenant to and with the said Grantee that they shall  
Grantors, their heirs, executors, administrators and assigns shall  
by these presents  
described premises, with the hereditaments and appurtenances, unto the said Grantee, his heirs, assigns  
and assigns, against the said Grantors, and against every other person lawfully claiming or who shall hereafter  
claim or any part thereof, by, from or under he, she, it, them or any of them.  
IN WITNESS WHEREOF, the said Grantee has caused these presents to be fully executed, signed and sealed this 26th day of May 1971  
SEALED AND DELIVERED In the Presence of:

*[Signature]*

*[Signature]*  
PERRY PHILLIPS  
*[Signature]*  
JEANNE E. PHILLIPS

State of Pennsylvania On the 26th day of May 1971  
County of Chester  
undersigned, personally appeared PERRY PHILLIPS and JEANNE E. PHILLIPS, his wife  
known to me (or satisfactorily proven) to be the person or persons whose names are subscribed to the within  
and acknowledged that they executed the same for the purposes therein specified.  
IN WITNESS WHEREOF, I have set my hand and official seal.

*[Signature]*  
WILLIAM M. HALL, Notary Public  
WEST CHESTER BOROUGH, CHESTER COUNTY  
MY COMMISSION EXPIRES JUNE 12, 1972

MAY 26 9 45 AM '71  
RECORDED OF DEEDS  
CHESTER CO. PA.

Book 31576

PERRY PHILLIPS and  
JEANNE E. PHILLIPS,  
his wife  
TO  
JOSEPH M. BLOSENSKI, JR.

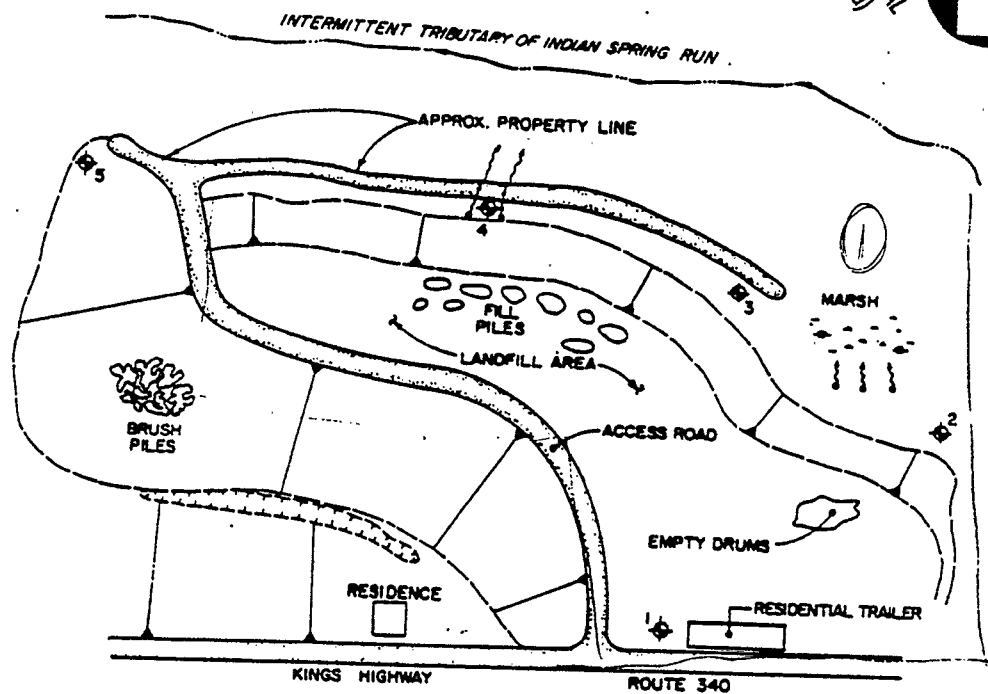
The address of the Grantee is  
R. D. 1  
Honey Brook, Pa. 19340

JOHN E. GOOD, ESQ.  
24 West Market Street  
West Chester, Pa. 19380

X39 800

RECORDED IN BOOK PAGE 437  
INDEXED IN BOOK PAGE 437  
MAY 26 1971

ORIGINAL  
(Red)



**LEGEND**

- ONSITE MONITORING WELL & IDENTIFICATION NUMBER
- SEEP
- DEPRESSION
- EMBANKMENT

**SITE LAYOUT**  
**BLOENSKI LANDFILL SITE, WEST CALN TWP, PA**  
 NOT TO SCALE

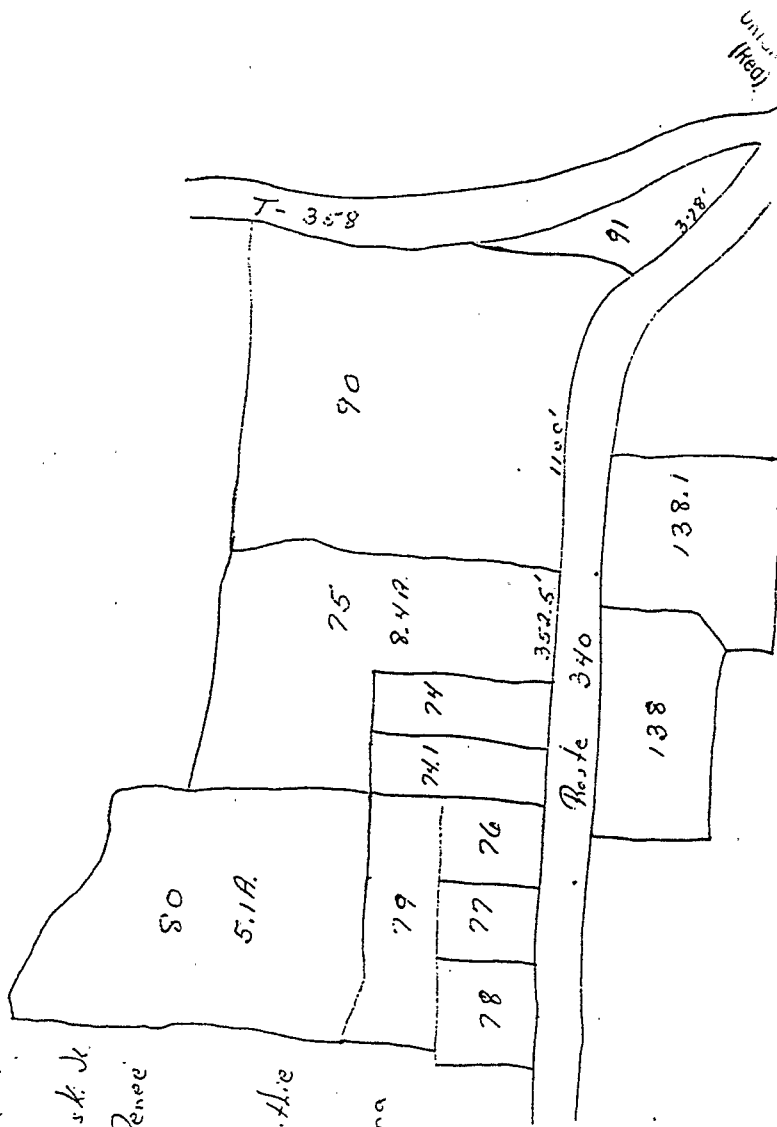
DEPOSITION  
EXHIBIT

200004 **FIGURE 1-2**



10- Alex M. Barry & Joseph M. Blazenski Jr. H/a Mountain Top Sanitary Landfill  
 9- Ellis R. & Dorothy Stern  
 8- John W. & Frances E. Smith  
 7- Lewis M. & Helen Wagner  
 6- Lem H. & Melba R. Umble

5- Joseph M. Blazenski Jr.  
 4- Richard F. & Renee R. Bardsley  
 3- Michael Ash  
 2- Charles R. & Dorothy M. Wallace  
 1- James L. & Irma M. Rissol  
 Michael Ash  
 1- Donald L. & Alice V. Canoll



200005

DEPOSITION  
 EXHIBIT

made this 10th day of August 1972.

ELDON HUGHES and MARY B. HUGHES, his wife

Grantors

of the last part and ALEX M. BARRY and JOSEPH M. BLOSENSKI, JR., t/a MOUNTAIN TOP  
SANDFILL LANDFILL

Grantees  
This is consideration of Six Thousand (\$6,000)

in and with the parties hereto is hereby acknowledged, the said Grantee to be hereby given and conveyed unto the said  
Grantee, their heirs, executors and assigns.

ALL THAT CERTAIN wood lot or piece of land situate in the Town-  
ship of West Cain, County of Chester and State of Pennsylvania, more  
particularly bounded and described as follows:

BEGINNING at a stone; thence by land now or late of David Hurts,  
north five degrees east thirty-one and one-tenth perches to a post; thence  
by land now or late of Andrew Keller, south seventy-eight and one-half de-  
grees east, twenty-eight and six-tenths perches to a stone; thence by land  
now or late of John Thomas and W. H. Bunn, south one and one-half degrees  
east, twenty-seven and seven-tenths perches to a chestnut stump; thence by  
land now or late of Ellis E. Stern, north eighty-five and one-half degrees  
west, thirty-one and five-tenths perches to the place of beginning.

CONTAINING five acres and seventy-five perches of land, be the  
same more or less.

BEING the same premises which Florence Huyard, widow, by deed  
dated December 7, 1969, and recorded in Deed Book D-39, Page 409, granted  
and conveyed unto Eldon Hughes, et ux, grantors herein.

REAL ESTATE TRANSFER TAX  
PAID \$ 60.00  
Jan K. Eitel  
COLL. CH.



U 40 852

200006

DEPOSITION  
EXHIBIT  
4  
JUL 15 10 37 AM '72

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF HEALTH

## SANITATION

## ESTABLISHMENT INSPECTION FORM

DEPOSITION  
EXHIBIT

PENNSYLVANIA, N.J.

SANITARIAN'S NO.	DATE	TRAVEL TIME	PROG. TIME
	2-21-74		

1. WASTE SUPPLY	2. SEWAGE	3. REFUSE	4. EQUIP. (ELECT. TREATMENT)	5. EQUIP. (CLEANING)	6. EQUIP. (HAND & STORAGE)	7. FOOD (REPAIR/REPAIR)	8. FOOD (WHOLESALE)	9. FOOD (REPAIR/REPAIR)	10. FOOD (REPAIR/REPAIR)	11. FOOD (REPAIR/REPAIR)	12. FOOD (REPAIR/REPAIR)	13. FOOD (REPAIR/REPAIR)	14. FOOD (REPAIR/REPAIR)	15. FOOD (REPAIR/REPAIR)	16. FOOD (REPAIR/REPAIR)	17. FOOD (REPAIR/REPAIR)	18. FOOD (REPAIR/REPAIR)	19. FOOD (REPAIR/REPAIR)	20. FOOD (REPAIR/REPAIR)	21. FOOD (REPAIR/REPAIR)	22. FOOD (REPAIR/REPAIR)	23. FOOD (REPAIR/REPAIR)	24. FOOD (REPAIR/REPAIR)

ESTABLISHMENT NAME	PERMIT, LICENSE AND/OR CERTIFICATE NUMBER	EXP. DATE
Joseph Blaser's Landfill		
ESTABLISHMENT ADDRESS	TOWNSHIP, BOROUGH, CITY	COUNTY
Route 340 Wagonwheel	West Caln	Chester
PROPRIETOR'S NAME	PROPRIETOR'S ADDRESS	
Mr. Joseph M. Blaser's Jr.	Lipett Rd. Rd. #1 Honeybrook	

BATHING WATER PH \_\_\_\_\_

BATHING WATER CLARITY \_\_\_\_\_

WATER: PUBLIC ☐ SEMI-PUBLIC ☐

SOURCE \_\_\_\_\_

DISINFECTION DEVICE: YES ☐ NO ☐

WATER SAMPLE COLLECTED \_\_\_\_\_

SEWERAGE: PUBLIC ☐ INDIVIDUAL ☐

TYPE OF SYSTEM: \_\_\_\_\_

PLANS: REC. ☐ ACC. ☐ REJ. ☐

TYPE OF DISINFECTANT \_\_\_\_\_

DISINFECTANT CONCENTRATION \_\_\_\_\_

PPM \_\_\_\_\_ PPM \_\_\_\_\_ PPM \_\_\_\_\_

WASH WATER TEMP. \_\_\_\_\_°F.

WASH TIME \_\_\_\_\_ SEC.

RINSE WATER TEMP. \_\_\_\_\_°F.

RINSE TIME \_\_\_\_\_ SEC.

REFRIGERATION TEMP. \_\_\_\_\_°F.

HOLDING TEMP. HEATED FOODS \_\_\_\_\_°F.

## CORRECTIVE PRIORITY PROGRAM

- In response to complaints that dumping was occurring on this site, an inspection was conducted by Mr. Wayne Lynn, Mr. David Lindell and myself. The gate leading to the landfill was open. A large amount of waste (100-150 loads) was dumped all over the landfill site. Waste was simply piled up, no spreading or compacting was done. Material dumped on the site included:
1. A large amount of household waste
  2. Industrial waste such as pallets, wood, metal, and board etc.
  3. Construction waste
  4. Furniture & other goods
  5. Tires

Mr. Lynn took several photographs of the site & will report to State Toxicologist, Dr. Norman F. J.

A resident of one of the trailers on the property threatened to flatten the tires of the State Car unless we left. He stated that this was private property and we could not inspect the site. ORIGINAL

Late I checked the tax records at the County Clerk's Office - the records are attached.

200008

COMMONWEALTH OF PENNSYLVANIA



DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street  
Norristown, Pennsylvania 19401  
Phone: 631-2413

May 3, 1976

CERTIFIED MAIL #851972

Joseph M. Blosenski, Jr.  
Trash Removal Service  
Lippitt Road  
Honeybrook, Pennsylvania 19344

SUBJECT: Blosenski Landfill - Route 340  
West Caln Township, Chester County

Dear Mr. Blosenski:

An inspection conducted on April 23, 1976, revealed that oil drums are being pierced or busted during recent compacting and covering operations near the North side (rear) of the property. The contents of the drums, an oil black substance, is being spread over the area.

These drums should have been removed prior to applying cover material. As part of the procedure to obtain compliance with paragraph 4 of the Consent Order, C.A. 2404, these drums must be removed from the site.

Also, a gate that is durable and permanent in nature must be installed in order to bar public dumping and scavenging.

Please refer to the letter dated March 31, 1976, CERTIFIED MAIL #110937, to familiarize yourself with proper closure procedures.

Thank you.

Very truly yours,

Mark A. Rosenberg  
Environmental Protection Specialist  
Region I - Norristown Office

MAR/mc/lm

200009

DEPOSITION  
EXHIBIT



Joseph H. Blosenski, Jr.  
Trash Removal Service  
Page 2

ORIGINAL  
(Red)

It is requested that you notify this office within seven (7) days of actions taken and intended to be taken to abate this violation. Failure to do so will result in the initiation of enforcement action by this Department.

Very truly yours,

Bruce D. Beitler  
Solid Waste Specialist

cc: Wayne Lynn  
Keith Walks, Esq.  
James Snyder  
File

ENCLOSURES: Act 241  
Chapter 75

SDS/lm

200010

November 4, 1977

Joseph M. Blossenski Property (Former Blossenski Landfill)  
Newlin Complaint  
Route 340; Wagontown  
West Caln Township

ORIGINAL  
(Red)

File

Bruce D. Beitler  
Solid Waste Specialist  
Norristown Region

On October 25, 1977, a report was received from an owner of property located adjacent to the former Blossenski Landfill site that liquid wastes were being discharged over the slopes of the Blossenski property onto their land. On November 1, 1977, an investigation of this complaint was conducted. The investigation found evidence that a large volume of a red, malodorous industrial waste had been recently deposited on the Blossenski property. The waste was running over the north slope of the former landfill into the Newlin's property, where ponds of the liquid extended over approximately two (2) acres. The strong, irritating odor associated with the waste was noticeable over much of the Newlin property and it appears vegetation is being killed in the areas where ponding has occurred. Ponds of the same red liquid were also observed at the top of the landfill slope as was evidence of recent dumping of a milky white waste liquid. Inspection of the north slope of the former landfill found some 6-10 paths where liquid wastes had previously flowed onto adjacent property. A few loads of bulk household trash have also been piled on the Blossenski property. Samples of the liquid waste flowing from the Blossenski property were collected as were samples from the ponds on the Newlin's property.

After the investigation attempts were made to conduct a complete inspection of the former landfill site, however, the residents would not permit access without the approval of Mr. Blossenski. The access gate to the former landfill was open.

cc: Keith Welks, Esq.  
James P. Snyder  
Wayne L. Lynn

BDB:slh

*Mr. J. Snyder*

200011

DEPOSITION  
EXHIBIT

August 28, 1978

Joseph Blosenski, Jr. Property  
Route 340  
West Caln Township; Chester County

Keith Welks, Esq.  
Assistant Attorney General  
Bureau of Litigation Enforcement

Re: ~~Brookline~~

ORIGINAL  
(Red)

Bruce D. Beitler  
Solid Waste Specialist  
Morristown Region

On August 21, 1978, in response to numerous complaints from area residents and local government officials, an inspection of the above captioned former landfill site was conducted. I was accompanied by Wayne Lynn and Trooper Patterson of the Pennsylvania State Police. Prior to the inspection a search warrant was obtained from District Justice John Catanese. Upon arriving at the site we spoke to a resident of the trailer who attempted to phone Mr. Blosenski. After being told Mr. Blosenski could not be reached, we left a copy of the warrant with the resident and proceeded with the inspection. A copy of the warrant was also left on the gate.

Site conditions at the time of the inspection are shown on the attached sketch. It is obvious that a substantial amount of waste has been deposited on the site over the past several months. The construction waste fill area appears to be an on-going operation while the fill area behind the trailer was worked last month. The location and nature of the large ash pile implies that bulky wastes are frequently burned on the site. Deposited along with the bulk waste are some 100 to 200 fifty-five gallon drums. While most of the drums are empty, an estimated 40 to 50 do contain liquids or sludges. Of these some 20 to 30 are leaking wastes onto the ground.

The inspection also found that surface run-off from the bulky waste and drum dumping area has created three wide paths of dead vegetation, two of which extend onto adjacent property.

A series of five photographs were taken.

In view of the present condition of this site, I feel that an enforcement strategy should be developed to insure closure of the site in accordance with the 1972 Court of Common Pleas Order. History has shown that summary actions have no affect in securing such closure.

BDB:efl

Ca Re 30

200012

DEPOSITION  
EXHIBIT

1875 New Hope Street  
Morristown, Pennsylvania 19401  
215 631-2413

ORIGINAL  
(Red)

September 1, 1978

ICI United States Inc.  
310 Turner Lane  
West Chester, PA 19380

Gentlemen:

The Department of Environmental Resources is presently conducting an investigation into the deposition of various types of waste material on property owned by Joseph M. Blosenski, Jr. in West Caln Township, Chester County. This site is not permitted or approved for disposal of solid wastes. Of particular concern to the Department are several fifty-five gallon drums and five gallon cans containing liquids and sludges. Many of these containers are open or have ruptured, thus permitting the wastes to flow across and seep into the soil on the property. Vegetation has been killed in some areas and there is a potential for polluting ground and surface waters. According to container labels, it appears that some of the waste material originated at your plant.

The Department requests that you promptly provide this office with any available information concerning the nature of the wastes deposited at this site. The Department further requests that you promptly notify this office of the steps you will take to prevent such unlawful disposal of your industrial wastes in the future.

Replies and/or questions concerning this matter should be directed to this office, at the above telephone number.

Very truly yours,

Wayne L. Lynn  
Regional Solid Waste Director

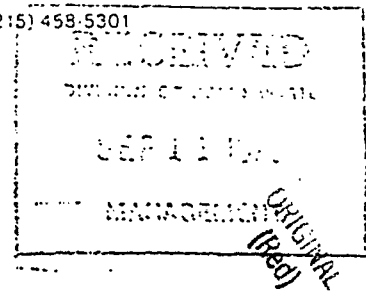
WLL:BDB:smc

cc: File

200013

9/6/78 Spoke with Henry Bingham 692 5300  
Blosenski hauled their 5 gallon buckets about 100 to 150 aerogel  
containers PTFE (fluorinated tetrafluoroethylene) used for coating fry pans.  
will emit toxic gases if burned (600-750°F). They paid 1.00/g.  
for disposal. He will call 232-2222 for more info.

DEPOSITION  
EXHIBIT



September 6, 1978

Mr. Wayne L. Lynn  
Regional Solid Waste Director  
Department of Environmental Resources  
1875 New Hope Street  
Norristown, Pennsylvania 19401

Dear Sir:

This is to confirm our telephone conversation on this date concerning your letter regarding the dumping of waste material by J. M. Blossenski.

We have also, since our conversation, taken the time to discuss the matter with Mr. Blossenski and have visited the dumping site mentioned in your letter.

Our Mr. D. Shively and Mr. A. Hellberg visited the site with Mr. Blossenski. They found empty drums that did come from our plant, but the contents were only what paint or undercoating material had adhered to the sides and a small residue at the bottom. They found no five gallon cans nor any evidence of paint spilled on the ground.

According to Mr. Blossenski, he uses this site as a storage place for empty steel barrels, junk automobiles, and other metal waste. Our people did see junk automobiles and scrap metals.

Again, according to Mr. Blossenski, the barrels or containers that contain paint or undercoat are taken from the plant to a place in West Chester where they are pumped out and disposed of elsewhere. He will supply us with the name of the place. He then takes the empty barrels or containers and stores them at the site that we visited. Incidentally, so that we are looking at the same place, this site is located on Route 340 near Wagontown, Pennsylvania.

As I mentioned in our telephone conversation, we dispose of no liquids or sludges other than paint or undercoating material, and this, for the most part, consists only of material left on the sides or bottom of the barrel by the pumps.

Mr. Blossenski hauls away all of our normal trash, wood, paper, sweepings,

Mr. Wayne L. Lynn  
September 6, 1978  
Page Two

ORIGINAL  
(Red)

etc. When we have barrels containing old paint or the normal empty barrels, these are segregated and hauled away as a separate contract for which we pay a premium. In the future, Mr. Blosenski will provide us with certification stating that the material has been disposed of as prescribed by law.

If you have any further questions, I am at your disposal, no pun intended.

Sincerely yours,

THE BUDD COMPANY/TRAILER DIVISION



A. Ambrosch  
Division Manager -  
Manufacturing and Engineering

AA/eem

cc: D. W. Shively  
J. E. Trego  
T. Ward, Budd Tech Center

200015

CHESTER COUNTY HEALTH DEPARTMENT  
225 NORTH WALNUT STREET  
WEST CHESTER, PA. 19380

ORIGINAL  
RECEIVED

NOV 30 1979

ENVIRONMENTAL RESOURCES  
WATER QUALITY MANAGEMENT  
HARRISTOWN REG. CORP. OF PA.

CERTIFIED MAIL #624694

November 27, 1979

Mr. Joseph M. Bloesenski, Jr.  
Lippitt Road  
Honey Brook, Pennsylvania 19344

Dear Mr. Bloesenski:

On Saturday, November 17, 1979 at approximately 10:00 a.m. at the intersection of Strasburg Road, Route 162 and Telegraph Road in West Bradford Township I witnessed the spilling of a relatively large amount of sludge from one of your trucks. The spilling occurred in front of a business firm. It nearly was dumped on my vehicle and another vehicle just in front of me.

Your truck was pursued to the Strasburg Landfill. The truck was identified by the name, Bloesenski Disposal Service, Telephone 942-2381. It carried the number - Truck #600 and had a tag license number of CM08600. The driver identified the sludge as coming from the West Chester Sewage Treatment Plant. He refused to give me his name but his shirt carried the name of "Danny".

I instructed the driver that such spillage was illegal under the regulations of the Chester County Health Department and that the spillage which had just occurred must be cleaned up that morning. I also requested that you or his supervisor call me on Monday morning.

Someone did clean up the spillage later that morning. This was very much appreciated. A Mr. Dodson of your firm also called on Monday morning indicating the sludge had come from the Downingtown Sewage Treatment Plant and that Borough officials had filled the hopper three quarters full when it should have been filled only one-half full. He indicated another plate was to be installed on the truck.

While we appreciate your efforts we must inform you that such leakage or spillage places you in violation of the Rules and Regulations of the Chester County Health Department, Chapter 300, §502, D. (1.) (b.). This regulation requires that, "The transportation of organic waste shall be: effected in watertight vehicles or containers; properly covered to avoid spillage, and cleaned at sufficient

200016

DEPOSITION  
EXHIBIT

Page 2

Mr. Joseph M. Blossenski, Jr.

November 27, 1972

Certified Mail #624694

ORIGINAL  
(Red)

intervals to prevent obnoxious odors..." Furthermore, if said material gains access to the Waters of the Commonwealth, this would also be in violation of Chapter 500, §502, D. (1.) (a.) as well as the Pennsylvania Clean Streams Law.

Vehicles used by your firm to transport such wastes shall be inspected by you and repaired so as not to permit leakage or spillage. Each must be made watertight and be suitably covered to prevent spillage. If sludge of a liquid nature is to be transported it must be accomplished in completely closed vehicles (tank trucks) not in open dump trucks. The above action must be completed before any further waste is transported. Failure to abide by this order will obligate this Department to seek compliance through legal channels.

Your immediate attention in this matter is appreciated. With the controversy that surrounds the Strasburg Landfill, additional problems in this area are certainly not helping the situation.

Very truly yours,

David A. Jackson, E.S., Director  
Division of Environmental Health  
Services

DAJ:zab

cc: West Bradford Township  
Penna. State Police  
Dept. of Environmental Resources  
Strasburg Landfill  
Downingtown Borough

200017



**B.D. H.A.**  
**BUDD TRAILER DIVISION**

Lewis M. Miller  
Assistant Mgr. - Division Employee Relations

51 456-5301  
DOWNINGTOWN, PENNSYLVANIA 19335

## DISPOSAL COMPANY

SAL PICK-UP SERVICE  
JOK, PA. 19344 - PHONE 942-2381 - 644-0669

ORIGINAL  
(Red)

April 13, 1984

**RECEIVED**

APR 19 1984

**LAW DEPT.**

Budd Trailer Division  
Route #100 Eagle Plant  
Downingtown, PA 19335

Gentlemen:

It is my understanding that your company has been served with legal documents (namely Civil Action Law) in reference to a suit against Blosenski Disposal Co. by Richard T. Bradley-Plaintiff in reference to hazzardous waste that was allegedly placed or dumped on adjacent property of the Plaintiff. In this suit it also names Perry Phillips and Jeanne Phillips as defendants.

Please be advised that we have engaged the service of James Cunningham, Esq. to represent our company in this legal action. It is our contention that we are not responsible for the allegations that are named in this suit. As you well know, this type of legal action can drag out a number of years in which it ends with great financial loss to all involved.

We offer this letter to state that our records show the first contract with you was November 1979 which was on or about the time the use of the 340 site was discontinued and we did not haul any liquids for you at any time. Furthermore, my attorney can submit verification in form acceptable to your attorney for your use in defense or provide any other documents which we are able to submit to help you.

Please be advised that your trash is being disposed of at a state approved landfill namely Lanchester Landfill. We would be happy to attach weight slips for each load pulled from your company to your monthly statement.

Please be advised that we will offer any assistance to you in reference to the above either through our attorney or a representative of our company. If you have any questions regarding this matter, please feel free to call me or James Cunningham Esq.

James Cunningham, Esq.  
304 E. Philadelphia Avenue  
Pottsville, Pa. 19525  
610-367-5700

Very truly yours,

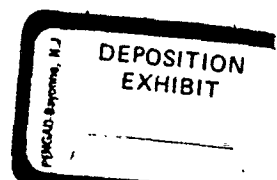
BLOSENSKI DISPOSAL CO.

*Joseph M. Blosenski, Jr.*  
Joseph M. Blosenski, Jr.

200018

JMB:psl

R. O. Lemke, Law Dept., Troy



# BLOSENSKI DISPOSAL COMPANY

DISPOSAL PICK-UP SERVICE  
LIPPIT ROAD - HONEY BROOK, PA. 19344 - PHONE 942-2381 - 644-0669

ORIGINAL  
(Red)

April 13, 1984

Liquid Nitrogen Processing Co.  
412 King Street  
Malvern, PA 19335

Gentlemen:

It is my understanding that your company has been served with legal documents (namely Civil Action Law) in reference to a suit against Blosenski Disposal Co. by Richard T. Bradley-Plaintiff in reference to hazzardous waste that was allegedly placed or dumped on adjacent property of the Plaintiff. In this suit it also names Perry Phillips and Jeanne Phillips as defendants.

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We offer this letter to state that our records show the first contract with you was November 1979 which was on or about the time the use of the 340 site was discontinued and we did not haul any liquids for you at any time. Furthermore, my attorney can submit verification in form acceptable to your attorney for your use in defense or provide any other documents which we are able to submit to help you.

Please be advised that your trash is being disposed of at a state approved landfill namely Lanchester Landfill. We would be happy to attach weight slips for each load pulled from your company to your monthly statement.

Please be advised that we will offer any assistance to you in reference to the above either through our attorney or a representative of our company. If you have any questions regarding this matter, please feel free to call me or James Cunningham Esq.

Very truly yours,

BLOSENSKI DISPOSAL CO.

Joseph M. Blosenski, Jr.

JMB:psl

200019

DEPOSITION  
EXHIBIT

# BLOSENSKI DISPOSAL COMPANY

DISPOSAL PICK-UP SERVICE

LIPPIT ROAD - HONEY BROOK, PA. 19344 - PHONE 942-2381 - 644-0669

April 13, 1984

ORIGINAL

Sartomer Company  
Marshall Bldg, W.C. Pike  
West Chester, PA 19380

Gentlemen:

It is my understanding that your company has been served with legal documents (namely Civil Action Law) in reference to a suit against Blosenski Disposal Co. by Richard T. Bradley-Plaintiff in reference to hazzardous waste that was allegedly placed or dumped on adjacent property of the Plaintiff. In this suit it also names Perry Phillips and Jeanne Phillips as defendants.

Please be advised that we have engaged the service of James Cunningham, Esq. to represent our company in this legal action. It is our contention that we are not responsible for the allegations that are named in this suit. As you well know, this type of legal action can drag out a number of years in which it ends with great financial loss to all involved.

We offer this letter to state that our records show the first contract with you was December 1980 which was on or about the time the use of the 340 site was discontinued, and we did not haul any liquids for you at any time. Furthermore, my attorney can submit verification in form acceptable to your attorney for your use in defense or provide any other documents which we are able to submit to help you.

Please be advised that your trash is being disposed of at a state approved landfill namely Lanchester Landfill. We would be happy to attach weight slips for each load pulled from your company to your monthly statement.

Please be advised that we will offer any assistance to you in reference to the above either through our attorney or a representative of our company.

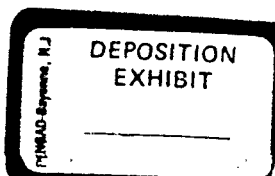
Very truly yours,

BLOSENSKI DISPOSAL CO.

*Joseph M. Blosenski, Jr.*  
Joseph M. Blosenski, Jr.

JMB:psl

200020



# BLOSENSKI DISPOSAL COMPANY

DISPOSAL PICK-UP SERVICE  
LIPPIT ROAD - HONEY BROOK, PA. 19344 - PHONE 942-2381 - 644-0869

April 11, 1984

ORIGINAL  
(Red)

A. Johnson & Co.  
213 Welsh Pool Road  
Lionville, PA 19353

Attention: Mr. Irving Brown

Dear Irving:

It is my understanding that your company has been served with legal documents (namely Civil Action Law) in reference to a suit against Blosenski Disposal Co. by Richard T. Bradley-Plaintiff in reference to hazzardous waste that was allegedly placed or dumped on adjacent property of the Plaintiff. In this suit it also names Perry Phillips and Jeanne Phillips as defendants.

On April 9, 1984 Mr. Frank Steidler, an employee of my company spoke to you in reference to the above as it was our understanding that as a result of your being served with said documents, it is your intention to discontinue service with the Blosenski Disposal Co.

Please be advised that we have engaged the service of James Cunningham, Esq. to represent our company in this legal action. It is our contention that we are not responsible for the allegations that are named in this suit. As you well know, this type of legal action can drag out a number of years in which it ends with great financial loss to all involved.

We offer this letter to state that our records show the first contract with you was February 28, 1979 after use of the 340 site was discontinued and we did not haul any liquids for you at any time. Furthermore, my attorney can submit verification in form acceptable to your attorney for your use in defense or provide any other documents which we are able to submit to help you.

Please be advised that your trash is being disposed of at a state approved landfill namely Lanchester Landfill. We would be happy to attach weight slips for each load pulled from your company to your monthly statement.

Trusting that you will reconsider and retain our company to dispose of your trash, we offer all assistance we can to continue to keep your account. If you have any questions regarding this matter, please feel free to call me or James Cunningham Esq.

Very truly yours,  
BLOSENSKI DISPOSAL CO.

Joseph M. Blosenski, Jr.

JMB:psl

200021

